

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

VICTOR CARLSTRÖM, STEPHEN BRUNE,
VINACOSSA ENTERPRISES AB,
VINACOSSA ENTERPRISES LTD,
BOFLEXIBILITET SVERIGE AB, SBS
RESURS DIREKT AB and SPARFLEX AB,

Plaintiffs,

vs.

FOLKSAM ÖMSESIDIG LIVFÖRSÄKRING,
SWEDBANK AB, SKATTEVERKET,
FINANSINSPEKTIONEN, JENS
HENRIKSSON, ERIK THEDÉEN, KATRIN
WESTLING PALM, and others known and
unknown,

Defendants.

19-cv-11569 (DLC)

**FOLKSAM ÖMSESIDIG LIVFÖRSÄKRING'S NOTICE OF MOTION TO
DISMISS THE COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, dated June 26, 2020, and the Declaration of Anders Andersson, executed on June 23, 2020, Folksam ömsesidig livförsäkring, a limited mutual insurance company, by its attorneys, hereby moves this Court, before Honorable Denise L. Cote, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York, 10007, for an order dismissing the Complaint with prejudice, in its entirety, pursuant to Federal Rule of Civil Procedure 12(b)(1), (b)(2), (b)(6), and the doctrine of *forum non conveniens*, and granting such other and further relief as the Court deems just and proper.

Dated: June 26, 2020

CRAVATH, SWAINE & MOORE, LLP



Timothy G. Cameron
Benjamin Gruenstein
Members of the Firm

Worldwide Plaza
825 Eighth Avenue
New York, NY 10019
(212) 474-1000
tcameron@cravath.com
bgruenstein@cravath.com

*Attorneys for Defendant Folksam
ömsesidig livförsäkring*